

KASEN & KASEN, P.C.
David A. Kasen, Esq.
Society Hill Office Park, Suite 3
1874 E. Marlton Pike
Cherry Hill, New Jersey 08003
Telephone: (856) 424-4144
Facsimile: (856) 424-7565
E-Mail: dkasen@kasenlaw.com
Counsel to Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In the Matter of:

ROBERT T. WINZINGER, INC.,

Debtor(s).

:
: Chapter 11
:
: Case No. 17-25972/KCF
:
: Hearing Date: August 7, 2018 at 10 a.m.
:
: **Oral Argument Requested**

NOTICE OF DEBTOR'S MOTION, PURSUANT TO 11 U.S.C. §§ 363 AND 105 AND FED. R. BANKR. P. 2002 AND 6004, FOR ENTRY OF ORDERS:
(I) AUTHORIZING THE DEBTOR TO SELL CERTAIN ESTATE PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES;
(II) APPROVING A "STALKING HORSE" ASSET PURCHASE AGREEMENT;
(III) APPROVING BIDDING PROCEDURES; (IV) APPROVING THE FORM, MANNER AND SUFFICIENCY OF NOTICE OF THE BIDDING PROCEDURES;
(V) SCHEDULING AN AUCTION AND A SALE HEARING TO CONSIDER APPROVAL OF THE HIGHEST AND BEST OFFER THEREFROM; AND
(VI) GRANTING OTHER RELATED RELIEF

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that the above-captioned debtor(s), Robert T. Winzinger, Inc. (the "**Debtor**") has filed papers with the Court seeking Orders, pursuant to 11 U.S.C. §§ 363 and 105 and Fed. R. Bankr. P. 2002 and 6004: (i) authorizing the Debtor to sell certain estate property free and clear of all liens, claims and encumbrances; (ii) approving a "stalking horse" asset purchase agreement; (iii) approving bidding procedures; (iv) approving the form, manner and sufficiency of notice of the bidding procedures; (v) scheduling an auction and a sale hearing to

consider approval of the highest and best offer therefrom; and (vi) granting other related relief (the "**Motion**").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested, or if you want the Court to consider your views on the Motion then on or before July 31, 2018, you or your attorney must:

File with the Court a written request for a hearing or, if the Court requires a written response, an answer, explaining your position at the U.S. Bankruptcy Court, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, New Jersey 08608.

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

David A. Kasen, Esquire
KASEN & KASEN, P.C.
1874 E. Marlton Pike, Suite 3
Cherry Hill, NJ 08003

Attend the hearing scheduled to be held on August 7, 2018 at 10:00 a.m., in Courtroom #2, U.S. Bankruptcy Court, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, New Jersey 08608.

If you or your attorney do not take these steps, the Court may decide that you do not oppose

the relief sought in the Motion and may enter Orders granting that relief.

Dated: July 11, 2018

KASEN & KASEN, P.C.

/s/ David A. Kasen

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